UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

TYLER DIVISION

OKLAHOMA LAW ENFORCEMENT RETIREMENT SYSTEM, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. ADEPTUS HEALTH INC., et al., Defendants.	§	Civil Action No. 6:16-cv-01243-RWS CLASS ACTION
WINSTON KIM, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. ADEPTUS HEALTH INC., et al., Defendants.	§	Civil Action No. 6:17-cv-00150-RWS CLASS ACTION

[Caption continued on following page.]

MICHIGAN LABORERS' PENSION FUND'S MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL

SASCHA TROLL, Individually and on Behalf of All Others Similarly Situated,	§	Civil Action No. 6:17-cv-00241-RWS
	§	
Plaintiff,	§	CLASS ACTION
	§	
vs.	§	
	§	
GREGORY W. SCOTT, et al.,	§	
	§	
Defendants.	§	
	§	

The Michigan Laborers' Pension Fund (the "Pension Fund"), by its counsel, hereby moves this Court for an Order: (i) consolidating the related actions pursuant to Fed. R. Civ. P. 42(a); (ii) appointing the Pension Fund as Lead Plaintiff in the above-referenced actions pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4; (iii) approving the Pension Fund's selection of Robbins Geller Rudman & Dowd LLP ("Robbins Geller") to serve as Lead Counsel and Ward, Smith & Hill, PLLC as Local Counsel; and (iv) granting such other and further relief as the Court may deem just and proper.[1] In support of this Motion, the Pension Fund submits a memorandum of law, the Declaration of Samuel H. Rudman ("Rudman Decl.") and an Order, filed concurrently herewith.

I. INTRODUCTION AND BACKGROUND

On October 27, 2016, Oklahoma Law Enforcement Retirement System filed the first securities class action in this District on behalf of all persons who purchased the Class A common shares (hereinafter the "common shares" or "common stock") of Adeptus Health, Inc. ("Adeptus" or the "Company"), pursuant to the Company's secondary public offering (the "SPO") on or about July 31, 2015 seeking to pursue remedies under Sections 11, 12(a)(2) and 15 of the Securities Act of 1933 (the "Securities Act"), as well as on behalf of the purchasers of the Company's common shares between April 23, 2015 and November 16, 2015, inclusive (the "Class Period"), seeking to pursue remedies under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 promulgated thereunder (17 C.F.R. §240.10b-5), *Oklahoma Law Enforcement Retirement System v. Adeptus Health Inc.*, No. 6:16-cv-01243-RWS (the "*Retirement System* Action").

On December 22, 2016, Laborers' Local 235 Benefit Funds filed the second complaint against Adeptus and many of its officers and directors on behalf of the same class of purchasers,

[1] Local Rule CV-7(h) requires a conference of counsel before filing motions. Pursuant to the PSLRA, however, any putative class member – regardless of whether that class member has filed a complaint – may file a motion to be appointed as lead plaintiff by May 9, 2017. 15 U.S.C. §78u-4(a)(3). Consequently, there is no way for the Michigan Laborers' Pension Fund to know which other class members, if any, plan to move for appointment as lead plaintiff until after all the motions have been filed. Under these limited circumstances, the Michigan Laborers' Pension Fund respectfully requests that the conferral requirement of Local Rule CV-7(h) be waived.

Laborers' Local 235 Benefit Funds v. Adeptus Health Inc., No. 6:16-cv-01391-RWS (the "*Laborers* Action). The *Laborers* Action alleged a Class Period that was ten months longer than the *Retirement System* Action (between June 25, 2014 and November 1, 2016) as well as Securities Act claims for three additional offerings (June 25, 2014 Initial Public Offering ("IPO"), May 5, 2015 SPO, and June 2, 2016 SPO). In addition, the *Laborers* Action also brought claims under the Exchange Act and the Securities Act.

On December 27, 2016, five motions to consolidate the *Retirement System* Action and the *Laborers* Action (together the "2016 Actions") were filed in conjunction with motions for appointment as lead plaintiff. *Retirement System* Action, Dkt. Nos. 15, 16, 18, 19, and 21. While the issues surrounding the appointment of lead plaintiff have been fully briefed, none of the parties opposed the consolidation of the 2016 Actions. As fully set forth in the briefing on the lead plaintiff motions, the Pension Fund is the only movant that meets all of the requirements of the PSLRA because the Alameda County Employees' Retirement Association and Arkansas Teacher Retirement System Group ("Alameda/ATRS Group"), which inappropriately calls itself the "presumptive lead plaintiff," is not entitled to the presumption because it is an improper grouping of unrelated entities which suffer from defects preventing their appointment as lead plaintiff. *Retirement System* Action, Dkt. No. 27.

On March 10, 2017, over a month after the lead plaintiff motions were fully briefed, plaintiff Winston Kim filed another securities class action in this District against Adeptus and several of its officers and directors on behalf of all persons or entities other than defendants who purchased or otherwise acquired the publicly traded securities of Adeptus from April 29, 2016 to March 1, 2017, both dates inclusive, *Kim v. Adeptus Health, Inc.*, No. 6:17-cv-00150 (the "*Kim* Action"). Like the *Retirement System* Action and the *Laborers* Action, the *Kim* Action also brought claims under the Exchange Act. On April 27, 2017, plaintiff Sascha Troll filed another complaint, nearly identical to the complaint in the *Kim* Action. The *Kim* Action and the *Troll* Action (the "2017 Actions") are pending before Judge Robert W. Schroeder, III. A motion to consolidate the 2017 Actions with the 2016 Actions is pending before this Court. *See Kim* Action, Dkt. No. 4.

The PSLRA requires district courts to resolve consolidation before appointing a lead plaintiff. *See* 15 U.S.C. §77z-1(a)(3)(B)(ii); 15 U.S.C. §78u-4(a)(3)(B)(ii).[2] Here, the 2017 Actions and the 2016 Actions should be consolidated into one action because they all involve substantially similar issues of law and fact. *See* Fed. R. Civ. P. 42(a). As a result, any lead plaintiff motions filed in response to the notice issued by plaintiffs in the 2017 Actions (that were not initially also filed in the 2016 Actions) should be deemed untimely. *See Kim* Action Dkt. Nos. 4, 13; *Retirement System* Action, Dkt. No. 45. In the event the Court does consider lead plaintiff motions filed pursuant to the notice issued in the 2017 Actions, the Pension Fund hereby renews its motion for appointment as lead plaintiff.

As soon as practicable after its decision on consolidation, the Court "shall appoint the most adequate plaintiff as lead plaintiff for the consolidated actions." *See* 15 U.S.C. §78u-4(a)(3)(B)(ii). The Pension Fund should be appointed Lead Plaintiff because it: (1) filed a timely motion for appointment as lead plaintiff in the 2016 Actions, and also by this Motion in the 2017 Actions; (2) to its counsel's knowledge, has the largest financial interest in the relief sought by the class; and (3) will fairly and adequately represent the interests of the class. *See* 15 U.S.C. §78u-4(a)(3)(B)(iii). Finally, the Pension Fund's selection of Robbins Geller as lead counsel should be approved. *See* 15 U.S.C. §78u-4(a)(3)(B)(v).

II. FACTUAL BACKGROUND

Adeptus owns and operates a network of independent freestanding emergency rooms in the United States. The complaints in the related actions allege that defendants misrepresented and failed to disclose material adverse facts in the Registration Statements and Prospectuses issued in connection with the June 25, 2014 Initial Public Offering ("IPO") and SPOs during the Class Period regarding the Company's business and prospects, including that: (i) Adeptus had been engaging in widespread predatory billing practices, particularly with respect to lower acuity level patients; (ii) Adeptus's predatory billing practices subjected the Company to numerous known, but undisclosed, risks, including monetary risks, reputational risks, risks associated with improper financial reporting, civil or criminal sanctions, and even exclusion from federal and state healthcare programs; (iii) the Company's financial statements had not been prepared in conformity with Generally Accepted Accounting Principles; and (i) contrary to defendants' representations about the Company's practice of referring lower acuity patients to urgent care facilities, Adeptus routinely treated lower acuity patients and excessively billed them for the services it rendered. As a result of these false statements and/or omissions, Adeptus common stock traded at artificially inflated prices during the Class Period, reaching a high of over $120 per share.

---

[2] The Securities Act and the Exchange Act were both amended with identical language. For ease of reference, this memorandum cites to the Exchange Act throughout, although the identical sections may be found in the Securities Act, 15 U.S.C. §77z-1.

On November 17, 2015, KUSA, an NBC-affiliated television station located in Denver, Colorado, aired a 9WANTS To Know investigative report about the billing practices at Adeptus's Colorado First Choice emergency rooms ("ERs"). According to the report, which had been based on "months" of investigation, the Company's First Choice ERs engaged in a pattern and practice of predatory overbilling. In response to the airing of the KUSA investigative report, the price of Adeptus common stock plummeted more than 22% on very heavy trading volume, falling from $59.87 per share on November 16, 2015 to $46.50 per share on November 17, 2015.

Then on November 1, 2016, Adeptus announced that it was replacing the Chairman of the Board of Directors. This news surprised investors and caused shares to drop 13.7%. The same day, after the market closed, Adeptus released its third quarter earnings results whereby the Company announced that it had missed earnings estimates and reported a net loss of $11.7 million in the third quarter of 2016 due to a number of issues. Adeptus reduced its adjusted guidance for the full year and admitted that it needed to secure emergency financing of $27.5 million (in preferred stock) from existing investors. The extent of Adeptus's issues shocked the market. Many analysts downgraded the stock. As a result of these disclosures, on November 1, 2016, the price of Adeptus stock dropped nearly 11% on unusually heavy trading volume. The next day, on November 2, 2016, the price of Adeptus stock declined an additional 68%. This represented a massive two-day decline of 71.5%.

Then on March 2, 2017, Adeptus filed a Form 12b-25 with the U.S. Securities and Exchange Commission announcing that it would not be able to file its annual report on Form 10-K for the fiscal year ended December 31, 2016 within the time period prescribed. The Form 12b-25 stated that the delay in filing was "due principally to the additional time the Company requires to complete it analysis of impairment of goodwill, intangible assets and investments in unconsolidated subsidiaries and evaluation of the need to write down its deferred tax assets." In addition, the Form 12b-25 stated that the Company had "identified material weaknesses with respect to internal control over financial reporting in the areas of revenue recognition, accounts receivable, accounting for a contribution to an unconsolidated joint venture, and accounting for equity (loss) earnings of unconsolidated joint ventures." Finally, the Form 12b-25 stated that "there is substantial doubt about the Company's ability to continue as a going concern absent its securing committed long-term financing." On this news, the price of Adeptus shares fell $3.76 per share, or more than 57%, to close at $2.70 per share on March 2, 2017.

On April 19, 2017, defendant Adeptus Health Inc. and a number of its affiliates filed bankruptcy petitions in the United States Bankruptcy Court for the Eastern District of Texas.

III. ARGUMENT

A. The Related Actions Should Be Consolidated for All Purposes

The arguments in favor of consolidation have been fully briefed before the Court in the 2016 and 2017 Actions. *Kim* Action, Dkt. No. 4; *Retirement System* Action, Dkt. Nos. 39, 45, 46 and 48. In short, the 2016 and 2017 Actions name the Company and other similar defendants and involve similar questions of law and fact during substantially the same class period, and should be consolidated.

B. The Pension Fund Should Be Appointed as Lead Plaintiff

The PSLRA establishes the procedure for the appointment of a lead plaintiff in "each private action arising under [the Exchange Act] that is brought as a plaintiff class action pursuant to the Federal Rules of Civil Procedure." 15 U.S.C. §78u-4(a)(1); *see also* 15 U.S.C. §78u-4(a)(3)(B)(i). First, the pendency of the action must be publicized in a widely circulated national business-oriented publication or wire service not later than 20 days after filing of the first complaint. 15 U.S.C. §78u-4(a)(3)(A)(i). Next, the PSLRA provides that the Court "shall adopt a presumption that the most adequate plaintiff is the person or group of persons" that –

(aa) has either filed the complaint or made a motion in response to a notice . . .;

> (bb) in the determination of the court, has the largest financial interest in the relief sought by the class; and
>
> (cc) otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure.

15 U.S.C. §78u-4(a)(3)(B)(iii). The Pension Fund meets each of these requirements and should therefore be appointed as Lead Plaintiff.

1. The Pension Fund's Motion Is Timely

The Pension Fund filed a motion in response to the notice issued in the *Retirement System* Action which was the first-filed case. *See Retirement System* Action, Dkt. No. 21. In addition, in the event the Court were to consider lead plaintiff motions in response to the notice issued in the 2017 Actions, the Pension Fund also timely submits this Motion. The issue published pursuant to the *Kim* action advised class members of: (1) the pendency of the action; (2) the claims asserted therein; (3) the proposed class period; and (4) the right to move the Court to be appointed as lead plaintiff within 60 days of the notice, or by May 9, 2017. *See* Rudman Decl., Ex. A. As this Motion is being filed on May 9, 2017, it is timely. Thus, if the Court were to consider motions filed in response to the 2017 Actions, the Pension Fund has complied with the PSLRA's first requirement and is entitled to be considered for appointment as lead plaintiff. 15 U.S.C. §78u-4(a)(3)(A).

2. The Pension Fund Has the Largest Financial Interest in the Relief Sought by the Class

During the Class Period, the Pension Fund purchased 16,779 shares of Adeptus Class A common shares and suffered more than $492,000 in losses due to defendants' alleged misconduct. *See* Rudman Decl., Ex. B.[3] To the best of its counsel's knowledge, there are no other plaintiffs with a larger financial interest.[4] Therefore, the Pension Fund satisfies the PSLRA's "largest financial interest" requirement.

---

[3] Named plaintiff Oklahoma Law Enforcement Retirement System who suffered losses under the Exchange Act of approximately $198,000, and purchased 2,500 Adeptus Class A common shares in the second SPO on or about July 29, 2015 at $105 per share and suffered losses under the Securities Act of approximately $118,000, supports the motion by the Pension Fund.

[4] Although the Alameda/ATRS Group claimed a larger interest in the lead plaintiff motion filed in connection with the 2016 Actions, the Pension Fund has demonstrated why the Alameda/ATRS Group does not meet the requirements to trigger the most adequate plaintiff

3. The Pension Fund Satisfies the Applicable Rule 23 Requirements at This Stage

In addition to possessing the largest financial interest in the outcome of the litigation, the lead plaintiff must also "otherwise satisf[y] the requirements of Rule 23 of the Federal Rules of Civil Procedure." 15 U.S.C. §78u-4(a)(3)(B)(iii)(I)(cc). "A comprehensive reading of the statute reveals that, at this stage of the proceedings," the Pension Fund "need only make a preliminary showing that it satisfies these requirements." *Gluck v. CellStar Corp.*, 976 F. Supp. 542, 546 (N.D. Tex. 1997).

"'Typicality does not require a complete identity of claims. Rather, the critical inquiry is whether the class representative's claims have the same essential characteristics as that of the putative class. If the claims arise from a similar course of conduct and share the same legal theory, factual differences will not defeat typicality.'" *Schwartz v. TXU Corp.*, No. 3:02-CV-2243-K, 2005 U.S. Dist. LEXIS 27077, at *48-*49 (N.D. Tex. Nov. 8, 2005) (citation omitted). Here, "[i]f successful in proving its injury and losses resulting from" defendants' allegedly fraudulent scheme, the Pension Fund "will necessarily prove the conduct which underlies the claims of all purported plaintiffs, just as it will establish the elements of those claims." *Gluck*, 976 F. Supp. at 546. Accordingly, the Pension Fund's "claims are typical of those of the purported class members." *Id.*

"To meet the adequacy-of-representation requirement of Rule 23(a)(4), Courts consider (1) whether the named representative shares common interest with other class members, and (2) whether the named representative will vigorously prosecute the interests of the class through the class counsel." *Schwartz*, 2005 U.S. Dist. LEXIS 27077, at *50. The Pension Fund is "well suited to adequately represent the purported class" because it "has a significant financial interest in the litigation," has selected "competent counsel" and "as an institutional investor, it is accustomed to acting in the role of a fiduciary, and its experience with investing and financial matters will only benefit the class." *Gluck*, 976 F. Supp. at 546; *see also* Rudman Decl., Exs. B-C.

The Pension Fund has "sufficiently demonstrated" that it "satisfies both the typicality and adequacy requirements of Rule 23 of the Federal Rules of Civil Procedure to the degree required by

---

presumption because it is an improper grouping and because ATRS is a professional plaintiff. *Retirement System* Action, Dkt. No. 27.

the statute." *Gluck*, 976 F. Supp. at 546. Therefore, the Court should adopt the presumption that the Pension Fund is the "most adequate plaintiff" under the PSLRA.

C. The Court Should Approve the Pension Fund's Selection of Counsel

The PSLRA vests authority in the lead plaintiff to select and retain lead counsel, subject to the Court's approval. *See* 15 U.S.C. §78u-4(a)(3)(B)(v). This Court should not disturb the lead plaintiff's choice of counsel unless it is necessary to "protect the interests of the class." 15 U.S.C. §78u-4(a)(3)(B)(iii)(II)(aa). The Pension Fund selected Robbins Geller to serve as lead counsel. *See* Rudman Decl., Ex. D.

Robbins Geller, a 200-attorney firm with nationwide offices, is actively engaged in complex litigation, particularly securities litigation. *See* Rudman Decl., Ex. D. District courts throughout the country have noted Robbins Geller's reputation for excellence, which has resulted in the appointment of Robbins Geller attorneys to lead roles in hundreds of complex class action securities cases. *See In re Enron Corp. Sec*., 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008) (Harmon, J.) (noting that the "experience, ability, and reputation" of Robbins Geller attorneys "is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country"). As such, the Court may be assured that the putative class will receive the highest caliber of legal representation from Robbins Geller if this Motion is granted. Accordingly, the Michigan Laborers' Fund's selection of counsel should be approved.

IV. CONCLUSION

The Court should consolidate the 2016 Actions and the 2017 Actions. As a result, the Court need not consider any new lead plaintiff motions filed in response to the notice issued pursuant to the 2017 Actions. The Pension Fund is the only movant that timely moved after the filing of the 2016 Actions, and meets all of the PSLRA's lead plaintiff requirements. As a result, the Pension Fund should be appointed Lead Plaintiff for the 2016 and the 2017 Actions. However, in the event the Court does consider lead plaintiff motions filed in response to the notice issued pursuant to the 2017 Actions, the Pension Fund's Motion should be granted because it has satisfied each of the PSLRA's requirements for appointment as lead plaintiff. As such, the Pension Fund respectfully requests that the Court appoint it as Lead Plaintiff, approve its selection of counsel, and grant such other relief as the Court may deem just and proper.

DATED: May 9, 2017

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN (*pro hac vice* pending)

s/ SAMUEL H. RUDMAN
SAMUEL H. RUDMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
TRICIA L. McCORMICK
655 West Broadway, suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
triciam@rgrdlaw.com

[Proposed] Lead Counsel for Plaintiff

WARD, SMITH & HILL, PLLC
T. JOHN WARD, JR.
Texas Bar No. 00794818
CLAIRE ABERNATHY HENRY
Texas Bar No. 24053063
ANDREA L. FAIR
Texas Bar No. 24078488
1127 Judson Road, Suite 220
Longview, Texas 75601
Telephone: 903/757-6400
903/757-2323 (fax)
jw@wsfirm.com
claire@wsfirm.com
andrea@wsfirm.com

Local Counsel

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 9, 2017.

s/ Samuel H. Rudman
SAMUEL H. RUDMAN

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

E-mail:srudman@rgrdlaw.com

Mailing Information for a Case 6:16-cv-01243-RWS Oklahoma Law Enforcement Retirement System v. Adeptus Health Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mario Alba , Jr**
  malba@rgrdlaw.com,e_file-ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Naumon Amjed**
  namjed@ktmc.com,hnorris@ktmc.com,mswift@ktmc.com
- **Shorty Craig Barrett**
  sbarrett@kglawfirm.com
- **Richard Thaddeus Behrens**
  thad.behrens@haynesboone.com,kim.dean@haynesboone.com,benjamin.goodman@haynesboone.com,daniel.gold@haynesboone.com,cecelia.madej@haynesboone.com
- **Darren J Check**
  dcheck@ktmc.com,rdegnan@ktmc.com,namjed@ktmc.com,ecf-filings@ktmc.com,hnorris@ktmc.com
- **Ryan T Degnan**
  rdegnan@ktmc.com,hnorris@ktmc.com,mswift@ktmc.com
- **Andrea Leigh Fair**
  andrea@wsfirm.com,wbc@wsfirm.com,ak@wsfirm.com,hmarlowe@wsfirm.com
- **Xenia Nicole Figueroa**
  nicole.figueroa@dlapiper.com,sherry.faulkner@dlapiper.com,judi.wilkerson@dlapiper.com,docketingchicago@dlapiper.com,4025@ecf.pacerpro.com
- **Claire Abernathy Henry**
  claire@wsfirm.com,wbc@wsfirm.com,ak@wsfirm.com,hmarlowe@wsfirm.com
- **Elton Joe Kendall**
  jkendall@kendalllawgroup.com,administrator@kendalllawgroup.com
- **George L McWilliams**
  glmlawoffice@gmail.com,cheflin@kglawfirm.com
- **James R Nelson**
  jr.nelson@dlapiper.com,sherry.faulkner@dlapiper.com,docketingchicago@dlapiper.com,karen.martel@dlapiper.com,david.clarke@dlapiper.com
- **Samuel H Rudman**
  srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file-ny@rgrdlaw.com
- **Earl Glenn Thames , Jr**
  glennthames@potterminton.com,egtdocket@potterminton.com,lindaslayter@potterminton.com
- **Thomas John Ward , Jr**
  jw@wsfirm.com,wbc@wsfirm.com,ak@wsfirm.com,hmarlowe@wsfirm.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

Mailing Information for a Case 6:17-cv-00150-RWS Kim v. Adeptus Health Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Xenia Nicole Figueroa**
  nicole.figueroa@dlapiper.com,sherry.faulkner@dlapiper.com,judi.wilkerson@dlapiper.com,docketingchicago@dlapiper.com,4025@ecf.pacerpro.com
- **Elton Joe Kendall**
  jkendall@kendalllawgroup.com,administrator@kendalllawgroup.com
- **Phillip Kim**
  pkim@rosenlegal.com
- **George L McWilliams**
  glmlawoffice@gmail.com,cheflin@kglawfirm.com
- **Laurence Rosen**
  lrosen@rosenlegal.com
- **Andy Tindel**
  atindel@andytindel.com,speterson@andytindel.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)